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Attorney for BERT VOTO-BERNALES

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	Case No. CR 3:06-mj-70253-JL
Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO MODIFY CONDITIONS OF PRETRIAL RELEASE TO PERMIT TRAVEL
vs.	
BERT VOTO-BERNALES, *et al.*,	
Defendants.	

STIPULATION

Defendant Bert Voto-Bernales, by and through his counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney C. David Hall, hereby stipulate and agree as follows:

1.   On April 26, 2006, this Court set conditions of release for defendant Bert Voto-Bernales, one of which was a condition that he not travel outside the Northern District of California.

2.   Mr. Voto-Bernales seeks permission to travel to Anaheim by car with his wife and children, departing on Monday, July 31st 2006 and returning to the Bay Area on Saturday, August, 5th 2006. The purpose of the trip is to visit Disneyland and Magic Mountain.

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3. Prior to July 31st, 2006, Mr. Voto-Bernales shall provide to his Pretrial Services Officer, Michelle Nero, all details about his travel plans, including addresses and phone numbers at which he can be reached.

4. United States Pretrial Services Officer Michelle Nero has no objection to the requested travel.

IT IS SO STIPULATED.

DATED: July 24, 2006   _____/s/_____
                                              Edward W. Swanson
                                              Swanson, McNamara & Haller LLP
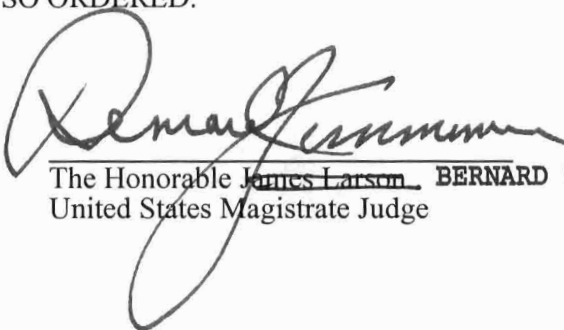   Counsel for Defendant Bert Voto-Bernales

DATED: July 24, 2006   _____/s/_____
                                              C. David Hall
                                              Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 26 July 06

The Honorable James Larson   BERNARD ZIMMERMAN
United States Magistrate Judge

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